



LABORERS' HEALTH & SAFETY FUND OF NORTH AMERICA

July 16, 2004

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C. W. Jameson, Ph.D.
National Toxicology Program, Report on Carcinogens
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Research Triangle Park, NC 27709
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Re: Comments on the Nomination of Asphalt Fumes for Listing in the
NTP Report on Carcinogens, 69 Fed. Reg. 28941 (May 19, 2004)

Dear Dr. Jameson:

The Laborers' Health and Safety Fund of North America represents over 500,000 union construction and other workers and affiliated contractors in the United States and Canada. Many of those members and contractors work in the asphalt paving industry.

For the past several years, our organization has been working with the National Asphalt Paving Association, Asphalt Institute, and other organizations related to the asphalt paving industry to address concerns about potential health effects from exposure to asphalt. This effort has included work with the National Institute for Occupational Safety and Health, OSHA, and other federal agencies. As a result of our partnership, significant progress is being made to develop better scientific data to help evaluate the potential health effects from asphalt exposure.

We believe that it is premature for a review of asphalt for listing in the NTP Report on Carcinogens. Two major scientific studies are underway in Europe that will provide important scientific data for this evaluation. These are an inhalation bioassay of asphalt fumes being conducted in Germany and a nested case control study of an asphalt worker cohort being done by IARC and several collaborating groups in Europe. These two studies should be completed by 2007 or 2008 and should provide a more complete picture of the potential carcinogenicity of asphalt.

Given that these two important studies are currently underway, along with other research and that other recent reviews of the carcinogenicity of asphalt have been inconclusive (e.g., NIOSH Health Hazard Review), we urge NTP to defer its review until better scientific information is available from the ongoing research studies.

Sincerely,


James M. Melius, MD, Dr.P.H.
Director of Research

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